

**Addendum to the
18618 West Oxnard Street Project Mitigated Negative Declaration
SCH# 2022030482**

January 2024

Introduction

The Department of Toxic Substances Control (DTSC) proposes to approve a Response Plan (RP) for the Oxnard Storage Project located at 18618 Oxnard Street in Los Angeles, CA (Project Site). The RP has been prepared to address and mitigate potential exposure for vapor intrusion into the building from the subsurface. The RP recommends converting the existing sub-slab depressurization system (SSDS) for Building 1 to a vapor intrusion mitigation system (VIMS) beneath the new concrete slab and constructing a new VIMS for Building 2 beneath the footprint of the proposed building. A Land Use Covenant (LUC) for the Site would also be placed after construction is complete.

Approval of the RP by DTSC is considered a discretionary action subject to compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq. To meet the requirements of CEQA, DTSC in its capacity as a responsible agency has prepared an Addendum to the 18618 West Oxnard Street Project Mitigated Negative Declaration (MND), State Clearinghouse No. 2022030482. This Addendum updates the project description from the prior environmental review to incorporate the recommended remedy selection from the RP and addresses the potential for the proposed remedial activities to result in significant environmental impacts.

State CEQA Guidelines Section 15164 allows for the preparation of an addendum to a previously certified MND to address minor changes to a project that will not meet the criteria for the preparation of a subsequent MND or Negative Declaration as specified in Section 15162(a). This Addendum identifies and analyzes the potential environmental effects of the proposed remediation and concludes that the Project activities will not result in significant and unavoidable impacts to the environment. Based on the foregoing analysis, implementation of the proposed remedial activities identified in the RP constitute minor changes to which the criteria of 15162(a) are not applicable, thus an Addendum is the appropriate CEQA document for approval of the RP.

Background Information and Prior Environmental Review

Response Plan

The Project Site is rectangular in shape and covers approximately 1.5 acres. The Project Site was vacant land prior to the initial development of rural residential structures, which were first observed in 1928. The Project Site appears to have been occupied by residential structures into the 1960s but was vacant by 1967. A two-story, 23,562 square-foot (SF) building was reportedly constructed in 1972. The two-story building has a slab-on-grade foundation and includes offices, classrooms, library, conference rooms, filming stages, recording studios, theaters, common dining areas, maintenance and equipment storage areas, electrical rooms, and computer server rooms. Historical tenants at the Project Site include Panavision from 1975 to 1995, a manufacturing operation of movie cameras. The Project Site's last occupant was Columbia College of Hollywood (CCH) that used the the two-story building from 1995 to 2023. CCH closed in January 2023.

Environmental investigations at the Project Site determined presence of volatile organic compounds (VOCs) in indoor air resulting from vapor intrusion from the subsurface. These subsurface impacts of VOCs present in soil vapor are associated with past releases at the former Bodycote Facility located to the east of the Project Site. From 2012 to 2022, an SSDS operated at the Project Site. Review of operational data concluded that the SSDS has been effective at eliminating the exposure pathway between VOCs and indoor air receptors, and that the current remedy is protective of human health.

PAL Oxnard Storage LLC (PALOS) is the current owner of the Project Site. PALOS envisions redevelopment of the property to house a new self-storage facility. Building 1, which is the existing CCH Building will be reconfigured into a storage warehouse. A new sub-floor will be installed below in which a VIMS would be installed. Building 2 will be new construction with installation of a VIMS beneath the footprint of the building. The addition of the VIMS would provide additional vapor intrusion protection to the building from subsurface impacts of VOCs.

Prior CEQA Review

DTSC's CEQA documentation for the RP is based on prior environmental review performed by the City of Los Angeles (City), the lead agency for the Oxnard Storage project. In November 2022 the City certified the 18618 West Oxnard Street Project Mitigated Negative Declaration (City of Los Angeles Case Number ENV-2021-9032-MND). The MND evaluated environmental impacts associated with development of a self-storage facility, and mitigation measures were incorporated to address impacts involving Noise and Tribal Cultural Resources. The MND determined that incorporation of feasible mitigation measures the implementation of the 18618 West Oxnard Street Project would result in less-than-significant impacts involving Noise and Tribal Cultural Resources.

It is noted that the City's MND included discussion of subsurface contamination originating on the adjacent property. However, the prior environmental review in the MND did not identify or evaluate the potential environmental effects of the proposed VIMS identified in the RP. Because a previous MND were approved by the City as the lead agency, DTSC is required by CEQA to conduct an analysis of the previous document and determine the type of environmental document required to be prepared for the project as provided by sections 15162, 15163, and 15164 of the CEQA Guidelines.

Description of Proposed Modifications

The project as modified includes the buildings and operations considered in the previously approved land use project plus incorporation of the activities identified in the RP to prevent the potential intrusion of VOCs in soil vapor into the buildings. The remedial activities proposed in the RP consist of installation of a VIMS beneath the footprint of the buildings. The addition of the VIMS would provide additional vapor intrusion protection to the building from subsurface impacts of VOCs. The modified project includes the same site boundaries, building footprint, aesthetic design, and operational characteristics as previously evaluated.

In addition, a land use covenant (LUC) will be required as part of the approval of the RP. The LUC will disclose the risks, restrictions, and requirements regarding soil vapor mitigation to future buyers and occupants. The LUC will be negotiated with DTSC and recorded at the Los Angeles County Recorder's Office and will be attached to the Project Site deed. The LUC will be binding

on PALOS and subsequent Project Site owners and will remain in effect until it is formally removed or modified, pursuant to Health and Safety Code Sections 25233, 25234, and 25398.7.

Scope of Addendum Analysis

This Addendum has been prepared in accordance with the requirements of CEQA and the State CEQA Guidelines (Title 14 California Code of Regulations Section 15000 et seq.). This Addendum considers each of the environmental impacts that were analyzed in the prior MND and focuses on determining whether the modified project would result in an increase in the severity of the impacts that were previously identified or would result in any new impacts not previously considered in the prior MND. The criteria for determining the significance of environmental impacts in this Addendum are the same as those contained within the prior MND. The topic areas considered in the prior MND include the following: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire.

Analysis of Potential Impacts

Under Section 15164(a) of the State CEQA Guidelines, an addendum to a previously certified MND shall be prepared by a lead or responsible agency if some changes or additions are necessary but none of the conditions described in Section 15162(a) requiring the preparation of a subsequent MND or negative declaration are applicable. The conditions listed under Section 15162(a) are as follows:

1. *Substantial changes are proposed in the project that will require major revisions of the previous MND or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.*
2. *Substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions of the previous MND or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.*
3. *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous MND was certified as complete or the negative declaration was adopted, shows any of the following:*
 - a. *The project will have one or more significant effects not discussed in the previous MND or negative declaration;*
 - b. *Significant effects previously examined will be substantially more severe than shown in the previous MND;*
 - c. *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*

- d. *Mitigation measures or alternatives which are considerably different from those analyzed in the previous MND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

The remedial activities proposed as part of the RP entail the installation of a VIMS beneath the footprint of the buildings. The VIMS would be incorporated as part of the same site preparation and construction activities which have already been considered in the previous environmental review document. Installation of the VIMS would not require any substantial changes to the timing or duration of site preparation and construction activities, the type of equipment utilized as part of site preparation and construction, or the number of workers involved or number of worker transportation trips for the site preparation and construction processes. As mentioned above, these components will not require any changes to the site boundaries, building footprint, aesthetic design, or operational characteristics from what was previously evaluated. Additionally, the modified project will remain subject to applicable mitigation measures identified in the 18618 West Oxnard Street Project Mitigated Negative Declaration (see Attachment A). This will entail using construction equipment limiting daily usage to no more than four hours per day and in the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease. Compliance with other applicable regulations, policies, standards, and specifications will further reduce or eliminate potential environmental effects of the project. Based on this information, the modified project would not result in substantial changes to the project as described in 15162(a)(1).

Regarding 15162(a)(2), the circumstances under which the project is undertaken have not changed in a manner such that some new or substantially increased significant environmental impact would occur. Existing and foreseeable planned development conditions in the City of Los Angeles remain the same as what was previously considered in the MND. No other substantial changes involving physical conditions of the surrounding environment or regulatory context are known to have occurred which would result in new or substantially increased significant effects involving the modified project.

Based on research and analysis performed during the preparation of this Addendum, there is no new information of substantial importance known concerning the project that will result in additional significant effects, any previously examined effects that will be substantially more severe; or infeasible mitigation measures or alternatives that are now feasible or considerably different from those analyzed in the previous 18618 West Oxnard Street Project Mitigated Negative Declaration. As such, the conditions described under 15162(a)(3) are not applicable.

Conclusion

As demonstrated in the preceding analysis, none of the conditions described in State CEQA Guidelines Section 15162 requiring preparation of a subsequent MND or Negative Declaration are applicable to the changes or additions necessary to address the proposed remedial activities included as part of the RP for the Oxnard Storage Project. Therefore, no additional CEQA analysis is required beyond this Addendum. A Notice of Determination presenting the findings of this Addendum will be filed by DTSC with the California State Clearinghouse within the State of California's Office of Planning and Research.

Attachment A

Mitigation Measures

Tribal Cultural Resources

MM-TRIBAL-1: In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the portions of the Projects outside of the buffered area may continue during this assessment period. The Fernandeano Tataviam Band of Mission Indians (FTBMI) shall be contacted regarding any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

Should the find be deemed significant in accordance with applicable law, the Project applicant shall retain a professional Native American monitor procured by the FTBMI to observe all remaining ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

The Lead Agency and/or applicant shall, in good faith, consult with the FTBMI on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities pursuant to the process set forth below.

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project, and (2) Department of City Planning, Office of Historic Resources (OHR).
2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in Items 2 through 5 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

9. Notwithstanding Item 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

Noise

MM-NOISE-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the Project Site's western, southern, and eastern boundaries that face Tarzana Terrace and Tarzana Treatment Center, Inc., and that generally bound the Project's driveway and parking lot areas. The prescribed sound barriers shall be installed for the duration of the Project's construction activities.

MM-NOISE-2 Bulldozers and other construction vehicles utilized to grade for the Project shall limit their daily usage to no more than four hours per workday.